

1 THE HONORABLE RICARDO S. MARTINEZ  
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8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE WESTERN DISTRICT OF WASHINGTON

10 AT SEATTLE

11 TODD HAGEN,

12 Plaintiff,

13 vs.

14 SAFEWAY, INC., a Delaware Corporation,

15 Defendant.

No. 2:20-cv-00134-RSM

STIPULATION FOR AND  
AGREED ORDER AMENDING  
TRIAL DATE AND CASE  
SCHEDULE

16  
17 I. STIPULATION

18 The parties stipulate and agree as follows:

19 1. The parties' joint status report in this matter was filed on March 2, 2020, just  
20 before the courts began issuing pandemic-related orders and just before the governor  
21 began issuing stay at home orders.

22 2. The parties have endeavored to continue with discovery but discovery has  
23 definitely been delayed as a result of the pandemic. The parties need additional time to  
24 comply with discovery deadlines and to prepare for trial. The deposition of the plaintiff  
25 is scheduled to take place on October 26, 2020. The parties need additional time for a

STIPULATION FOR AND AGREED  
ORDER AMENDING TRIAL DATE  
AND CASE SCHEDULE - 1

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trial date.wpd



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Seattle, WA 98136  
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1 Rule 35 physical examination, to prepare and disclose expert reports and to complete  
2 other discovery.

3. The parties have not previously requested a continuance.

4. The parties jointly request that the court enter the subjoined order and  
and its order setting trial date and related dates (dkt. #7) by setting the following new

Disclosure of expert testimony	January 8, 2021
Deadline for filing motions related to discovery	January 28, 2021
Discovery completed by	February 26, 2021
Dispositive motion filing deadline	March 19, 2021
Mediation per LCR 39.1(c)(3)	April 16, 2021
Motion in limine filing deadline	May 26, 2021
Agreed pretrial order due	June 9, 2021
Trial briefs, proposed voir dire, jury instructions, neutral statement of the case, trial exhibits	June 16, 2021
Trial	June 21, 2021

Dated: October 13, 2020.

## DIXON & CANNON, LTD.

By: s/ James R. Dixon  
James R. Dixon, WSBA # 18014  
Attorney for Plaintiff

## TURNER KUGLER LAW, PLLC

By: s/ John T. Kugler  
John T. Kugler, WSBA # 19960  
Attorney for Defendant

**STIPULATION FOR AND AGREED  
ORDER AMENDING TRIAL DATE  
AND CASE SCHEDULE - 2**



## II. ORDER

The court has reviewed the foregoing stipulation of the parties and ORDERS that the original order setting trial date and related dates (dkt. #7) is amended as follows:

Disclosure of expert testimony	January 8, 2021
Deadline for filing motions related to discovery	January 28, 2021
Discovery completed by	February 26, 2021
Dispositive motion filing deadline	March 19, 2021
Mediation per LCR 39.1(c)(3)	April 16, 2021
Motion in limine filing deadline	May 26, 2021
Agreed pretrial order due	June 9, 2021
Trial briefs, proposed voir dire, jury instructions, neutral statement of the case, trial exhibits	June 16, 2021
Trial	June 21, 2021

DATED: October 13, 2020.

  
RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE

**STIPULATION FOR AND AGREED  
ORDER AMENDING TRIAL DATE  
AND CASE SCHEDULE - 3**

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## **CERTIFICATE OF SERVICE**

I hereby certify that on October 13, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Attorney for Plaintiff:  
James Dixon  
Dixon & Cannon, Ltd.  
601 Union St., Ste. 3230  
Seattle, WA 98101  
(206) 957-2247  
james@dixoncannon.com

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

none

T. Kugler \_\_\_\_\_ s/ John

KUGLER, WSB #19960  
JOHN T.

Defendant Safeway Inc.  
Attorney for

KUGLER LAW, PLLC  
TURNER

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E-mail:

**STIPULATION FOR AND AGREED  
ORDER AMENDING TRIAL DATE  
AND CASE SCHEDULE - 4**

